

Texas Department of Water Resources

INTEROFFICE MEMORANDUM

TO : Gary Schroeder, Industrial Wastewater and Solid Waste Section, Enforcement and Field Operations Division
THRU : C.R. Miertschin, Director
Enforcement and Field Operations Division
FROM : Henry Karnei, Jr., Environmental Quality Specialist
District 8
SUBJECT: Kerr-Ban Furniture Manufacturing Company, S.W. Registration No. 31035-
Solid Waste Compliance Monitoring Inspection-San Marcos, Hays County.

DATE: July 1987

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The initial inspection was conducted on February 5, 1987. The writer contacted Dean Murray, General Manager, and with him toured the facilities. Mr. Murray was unable to answer many questions concerning the disposal of Class I waste from Kerr-Ban. The writer did question Mr. Murray about the disposal of Class I waste material on-site in a landfill on company property. Mr. Murray stated that the company never had or used a landfill on-site for disposal of waste material. It was suggested by Mr. Murray that the writer contact Larry Hanson, Industrial Engineer for Kerr-Ban, for additional information.

On March 27, 1991 the writer accompanied by Larry Hanson conducted a follow-up solid waste inspection of Kerr-Ban. The following information was obtained:

1. The company constructed a landfill in May 1977. The landfill was used from May 1977 to November 1977. The landfill was unlined. All Class I material (oil base stains, organic solvents, paint booth sludge, waste thinners and glue waste) was dumped into the landfill. No containers of any kind were utilized. All waste material was carried to the landfill in drums and was then dumped, or poured, into the landfill. Mr. Hanson stated that no drums should be buried in the landfill because all material was poured into the pit. The landfill was closed and covered with dirt in November 1977. All that remains is a depressed area showing that a landfill did exist at one time. (See Photo 1.)
2. According to Mr. Hanson, all Class I waste material was shipped and disposed by Browning-Ferris Industries located at 11013 Beaumont Highway in Houston, Texas, from November 1977 to October 1979.
3. From October 1979 to the present, Kerr-Ban has been disposing its Class I waste material with Texas Ecologists at Robstown, stated Mr. Hanson.
4. During the March 27th inspection, an additional abandoned landfill was discovered. This landfill contains buried drums (see Photos 2 & 3). Mr. Hanson had no knowledge that this landfill existed. From 1969 to 1969, the buildings and land belonged to National Furniture Contractors. Kerr-Ban purchased the company in 1969. Mr. Hanson stated that possibly the drums were buried by that company. The exposed drums contain a strongly solidified material (see Photo 3). The drums are labeled Urea Formaldehyde resin-

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a glue product. Exact numbers and what different materials that were buried are unknown.

5. All scrap lumber, sawdust, wood shavings and pressed wood are incinerated on-site.
6. All scrap metal, glass and paper is disposed at the San Marcos landfill.
7. Kerr-Ban is presently storing Class I material on-site and is disposing Class I material every 90 days. The last shipment of Class I material was on January 28, 1981 to Texas Ecologists and consisted of 80 drums.
8. Approximately, 80% of the waste generated is paint booth sludge.
9. Approximately, 100-150 drums of Class I waste are stored on-site in various positions. These include oil base stains, waste solvents, waste glue and paint booth sludge. Presently, all waste material is stored upon open, unbermed soil. All waste material is stored adjacent to raw materials and as a result, waste material has been commingled with useable products. Photos 4, 5, and 6 illustrates the combined waste storage area with the raw material area. The drums in Photos 4 and 5 are for the most part waste material while the drums in Photo 6 are useable material.
10. Many of the drums that contain waste material have not been properly sealed or labeled (see Photo 7). These open drums are exposed to rainfall runoff.
11. Many waste drums have leaked or have been improperly stored on their sides causing the contents to spill upon the ground (see Photos 8, 9, and 10).
12. In addition to the waste material spilled, or leaked to the ground, a similar problem has developed where the raw material drums have been stored. This area has been used for a number of years and the spillage observed in this area is from an accumulation of leaking drums. Many of the drums stored in this area are metal 55-gallon open head type containers. From storing the drums on their sides, the area has been contaminated by leakage. Photos 11, 12, 13, and 14 illustrates the spillage that has occurred in the raw material storage area.
13. No containment system (berms) is provided for the drum storage area. The area is exposed and subject to rainfall runoff.
14. Kerr-Ban employs approximately 80 people.

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After the on-site inspection was conducted, the writer discussed with Mr. Hanson what measures should be initiated to prevent further damage to the environment. The following recommendations were suggested:

1. Waste material should not be commingled with useable material. Two (2) separate storage areas should be utilized.
2. All waste drums should be properly labeled. The date waste material was accumulated within the drums should be clearly marked and visible for inspection according to T.D.W.R. Rule No. 156.22.06.009.
3. All waste drums should be properly sealed and stored in the upright position to prevent leakage and contamination of the environment through rainfall runoff.
4. A standard operating procedure should be developed for the employees on proper handling of waste material.
5. Some type of containment structure should be provided for the waste drum storage area and for the raw material storage area. The drums should be stored upon some type of impermeable surface to prevent contamination of soil and ground water. An impermeable surface would also facilitate clean-up of spills.
6. Immediate clean-up of all spill areas should be initiated including the spills that have occurred in the raw materials area. The material resulting from clean-up should be properly drummed and disposed at a Class I site.
7. The drums buried in the "unknown" landfill should be identified as to what material they contained and as to the volume that was buried.
8. A letter should be submitted to the T.D.W.R. District 8 office addressing the above recommendations and the time frame for clean-up. The letter should be submitted within two (2) weeks from the inspection date.
9. A letter should be submitted to Ed Hatten, T.D.W.R. Central Office, concerning the abandoned landfills. Stated within the letter should be dates when both landfills were utilized.
10. A letter should also be submitted to Jay Snow, T.D.W.R. Central Office, concerning the failure to report that an inactive landfill was used for the disposal of Class I waste. This should address Page 12, Table III-3 of the permit application for Industrial Solid Waste Storage/Processing/Disposal facility.

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On April 22, 1981 the District 8 office received a letter from Kerr-Ban Furniture Company addressing the problem areas that were discovered on the March 27, 1981 inspection (see Attachment A). From the letter, it appears Kerr-Ban has initiated measures to clean-up the problems encountered during the inspection. A follow-up inspection will be conducted to determine compliance.

On June 25, 1981 the following laboratory results were obtained from samples collected during the March 27, 1981 inspection (see Attachment B).

Table I Physicochemical analysis of waste spilled to the ground.

- *Toluene
- Butyl Acetate
- Ethyl Benzene
- 1, 2, dimethyl Benzene
- 2-ethoxy ethanol acetate
- Trimethyl Benzene
- Alpha phellandrene
- di-n-butyl phthalate
- phthalate
- pyruvaldehyde

* - Listed in decreasing concentrations

Henry Karni, Jr.
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Vernon R. Francis
Vernon R. Francis

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Attachments

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